

Mark H. Hutchings, Esq.
Nevada Bar No. 12783
John B. Lanning, Esq.
Nevada Bar No. 15585
HUTCHINGS LAW GROUP
400 S. 4th St., Suite 550
Las Vegas, Nevada 89101
Telephone: (702) 660-7700
Facsimile: (702) 552-5202
MHutchings@HutchingsLawGroup.com
Attorney for Plaintiff,
Michael D. Reiner, M.D., A Professional Corporation

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL D. REINER, M.D., A
PROFESSIONAL CORPORATION, a Nevada
professional corporation

Plaintiff,

v.

CVS PHARMACY, INC., a Rhode Island
Corporation; WALMART INC., a Delaware
Corporation; SMITH'S FOOD & DRUG
CENTERS, INC., a Delaware Corporation;
MEGAN VENEGAS, an individual; DOES I
through X, inclusive; ROE BUSINESS
ENTITIES I through X, inclusive,

Defendants.

Case No.: 2:22-cv-00701-RFB-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME FOR
PLAINTIFF TO FILE RESPONSE TO
DEFENDANTS' VARIOUS MOTIONS
AND TO EXTEND TIME TO FILE
DEFENDANTS' REPLIES**

(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Michael D. Reiner, M.D., a
Professional Corporation ("Plaintiff"), through his counsel Hutchings Law Group and
Defendants Walmart Inc. and Megan Venegas ("Walmart" & "Venegas"), through their counsel
Peterson Baker, PLLC and Jones Day; Defendant CVS Pharmacy, Inc. ("CVS"), through its
counsel Saltzman Mugan Dushoff and Foley & Lardner, LLP; and Defendant Smith's Food &
Drug Centers, Inc. ("Smith's"), through its counsel, Cooper Levenson, P.A.; that the Plaintiff,
shall have a one-week extension up to and including May 12, 2023, in which to file its
Response to defendant CVS Pharmacy, Inc.'s ("CVS") Motion to Dismiss Amended Complaint
[ECF No. 80] and Defendant Walmart Inc.'s ("Walmart") Motion to Dismiss First Amended

1 Complaint and Special Motion to Dismiss Under Nevada’s Anti-SLAPP Statute [ECF No. 82
2 and ECF No. 83], Defendants Megan Venegas’ (“Venegas”) Motion to Dismiss First Amended
3 Complaint and Special Motion to Dismiss Under Nevada’s Anti-SLAPP Statute [ECF No. 84
4 and ECF No. 85], Defendants Walmart’s and Megan Venegas’ Motion to Stay Discovery
5 Pending Decision on Their Motions to Dismiss and Special Motions to Dismiss [ECF No. 86],
6 Defendant Smiths Food & Drugs Centers, Inc.’s Joinder in the Motions to Dismiss filed by
7 CVS Pharmacy, In (ECF No. 80) and by Walmart, Inc. (ECF No. 82) [ECF No. 87], CVS
8 Pharmacy, Inc.’s Joinder in Walmart, Inc. and Megan Venegas’ Motion to Stay Discovery
9 Pending Decision on Their Motions to Dismiss and Special Motions to Dismiss [ECF No. 88]
10 and Defendant Smith’s Food & Drug Centers, Inc.’s Joinder in Defendants Walmart’s and
11 Megan Venegas’ Motion to Stay Discovery Pending Decision on Their Motions to Dismiss and
12 Special Motions to Dismiss [ECF No. 91].

- 13 1. The Parties request the Court grant an extension of the deadline to file Plaintiff’s
- 14 Responses to May 12, 2023.
- 15 2. The Parties further request the Court grant an extension of the deadline to file any replies
- 16 in support of the motions from May 19, 2023 to May 26, 2023.
- 17 3. This is the first request for an extension of time for the Plaintiff to file Responses on all
- 18 pending Motions, and the first request for an extension of time for the Defendants to file
- 19 Replies in support of all pending Motions.
- 20 4. This request is made in good faith and not for the purpose of delay.

21 Dated this 2nd day of May, 2023.

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Respectfully submitted,

HUTCHINGS LAW GROUP, LLC

By: /s/ Mark H. Hutchings

MARK H. HUTCHINGS, ESQ.

Nevada Bar No. 12783

Mhutchings@Hutchingslawgroup.Com

HUTCHINGS LAW GROUP, LLC

400 S. 4th St., Suite 550

Las Vegas, Nevada 89101

Telephone: 702.660.7700

Facsimile: 702.552.5202

*Attorneys for Plaintiff Michael D. Reiner,
M.D., A Professional Corporation*

COOPER LEVENSON, P.A.

By: /s/ Jerry S. Busby

JERRY S. BUSBY, ESQ.

Nevada Bar No. 1107

jbusby@cooperlevenson.com

GREGORY A. KRAEMER, ESQ.

Nevada Bar No. 010911

gkraemer@cooperlevenson.com

ANDRE T. MARQUES, ESQ.

Nevada Bar No. 14737

amarques@cooperlevenson.com 3016 West

Charleston Blvd., Suite 195

Las Vegas, NV 89102

Telephone: 702.366.1125

Facsimile: 702.366.1857

*Attorneys for Smith's Food & Drug Centers,
Inc.*

SALTZMAN MUGAN DUSHOFF

By: Matthew T. Dushoff

MATTHEW T. DUSHOFF, ESQ.

Nevada Bar No. 4975

mdushoff@nvbusinesslaw.com

1835 Village Center Circle

Las Vegas, NV 89143

Telephone: 702.405.6122

Facsimile: 702.405.8501

STEPHANIE ADAMO, ESQ.

(Admitted Pro Hac Vice)

sadamo@foley.com

FOLEY & LARDNER, LLP

1400 16th Street, Suite 200

Denver, CO 80202

JONATHAN W. GARLOUGH, ESQ.

(Admitted Pro Hac Vice)

jgarlough@foley.com

PETERSON BAKER, PLLC

By: /s/ Tamara B. Peterson

TAMARA BEATTY PETERSON,
ESQ.

Nevada Bar No. 5218

tpeterson@petersonbaker.com

DAVID E. ASTUR, ESQ.

Nevada Bar No. 15008

dastur@petersonbaker.com

701 S. 7th Street

Las Vegas, NV 89101

Telephone: 702.786.1001

Facsimile: 702.786.1002

WILLIAM G. LAXTON, JR., ESQ.

(Admitted Pro Hac Vice)

wglaxton@jonesday.com

YAAKOV M. ROTH, ESQ.

(Admitted Pro Hac Vice)

yroth@jonesday.com

FOLEY & LARDNER, LLP
321 N. Clark Street, Suite 300
Chicago, IL 60654

Attorneys for CVS Pharmacy, Inc.

JEFFREY R. JOHNSON, ESQ.
(Admitted Pro Hac Vice)
jeffreyjohnson@jonesday.com
JONES DAY
51 Louisiana Avenue N.W.
Washington, DC 20001
Telephone: 202.879.3939

SERGIO A. TOSTADO, ESQ.
(Admitted Pro Hac Vice)
stostado@jonesday.com
JONES DAY
325 John H. McConnell Blvd., Suite
600
Columbus, OH 43215
Telephone: 614.469.3939

*Attorneys for Defendant Walmart Inc.
and Megan Venegas*

ORDER

IT IS SO ORDERED:


United States Magistrate Judge

Dated: May 2, 2023